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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2025 JUN -2 PM 1:36

Danielle Amara Shakur

25 CV 4718

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

COMPLAINT

Cassandra Ventura

Sean Combs

Bad Boys Entertainment LLC

Post Graduate Center for Mental Health

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ Federal Question
- ☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

First Amendment
Second Amendment
Fifth Amendment

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Danielle Amara Shakur is a citizen of the State of
(Plaintiff's name)

The state of New York
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, cassandra ventura, is a citizen of the State of
(Defendant's name)

California & Connecticut

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Post Graduate center, is incorporated under the laws of
the State of for mental Health
new york

and has its principal place of business in the State of New York
or is incorporated under the laws of (foreign state) _____

and has its principal place of business in New York.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Danielle Amara shakur
First Name Middle Initial Last Name

177 Columbia street # 5L
Street Address

Kings, Brooklyn New York 11231
County, City State Zip Code

(646) 325-2250 danielle.shakurenou@gmail.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Cassandra ventura
 First Name Last Name
Entertainer
 Current Job Title (or other identifying information)
 Current Work Address (or other address where defendant may be served)
La Jolla, San Diego CA
 County, City State Zip Code

Defendant 2: Sean Combs
 First Name Last Name
Entertainer
 Current Job Title (or other identifying information)
80 29th Street
 Current Work Address (or other address where defendant may be served)
Kings, Brooklyn NY 11231
 County, City State Zip Code

Defendant 3: Bad Boys Entertainment LLC
 First Name Last Name
Business
 Current Job Title (or other identifying information)
80 29th Street
 Current Work Address (or other address where defendant may be served)
Kings, Brooklyn NY 11231
 County, City State Zip Code

Defendant 4: Post Graduate center for mental Health
First Name Last Name
Apartment Building organization
Current Job Title (or other identifying information)
177 columbia street
Current Work Address (or other address where defendant may be served)
Kings, Brooklyn New York 11231
County, City State Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: 177 columbia street Brooklyn, NY 11231

Date(s) of occurrence: 1991 - present

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

my name is Danielle Amara Shakur and I am a victim of crissandra ventura and sean combs, Bad Boys Entertainment LLC, and Post Graduate center for mental. I believe that ms. ventura and mr. combs have been conspiring with the New York Police Department, The State of New York, Post Graduate center for mental Health (my place of residence, along with a plethora of other governmental agencies to prevent me from testifying. mr. combs has been a violent figure in my life and has caused myself

along with my family from the moment I was born. He has established a network, per Ms. Ventura's lawsuit, of Police Officers, medical professionals, and Government officials to harass, taunt, and criminalize me to prevent me from testifying, which violates my Right to Fair Trial. I believe Ms. Ventura has access to what network as well and has been targeting me w/ PGCEMH

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

On 01/28/25, I submitted a complaint to Post Graduate Center for mental ^{Health} that I believed they were participating in organized crime. I was then assaulted outside of my home on 01/29/25

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am seeking \$10,200,000,000 (10.2 Trillion Dollars) in damages. I am also seeking punitive damages for decades of terrorism, unlawful surveillance, and witness tampering

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

06/02/25 _____
Dated Plaintiff's Signature
Danielle A Shaker _____
First Name Middle Initial Last Name
177 Columbia Street #5L _____
Street Address
Kings, Brooklyn New York 11231 _____
County, City State Zip Code
(646) 325-2250 _____
Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.